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October 18, 2019

Via CERTIFIED MAIL – Return Receipt Requested

Managing Agent
United Natural Foods West, Inc.
7909 S Union Ridge Parkway
Ridgefield, WA 98642

Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN

Dear Managing Agent:

We represent Columbia Riverkeeper, 407 Portway Ave, Suite 301, Hood River, OR 97031. This letter provides you with sixty days' notice of Columbia Riverkeeper's intent to file a citizen suit against United Natural Foods West, Inc. ("UNFI") under section 505 of the Clean Water Act ("CWA"), 33 U.S.C § 1365, for the violations described below. This letter also requests a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by UNFI's National Pollution Discharge Elimination System ("NPDES") permit.

UNFI was granted coverage under Washington's Industrial Stormwater General Permit ("ISGP") issued by the Washington Department of Ecology ("Ecology") on June 6, 2016 and set to expire on December 31, 2019, under permit number WAR303638 (the Permit). UNFI submitted an application for permit renewal on April 23, 2019, 180 days prior to the expiration of the permit, as required under the ISGP.

UNFI has violated and continues to violate the CWA (see Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342) and the terms and conditions of the Permit with respect to the operation of, and discharges of stormwater and pollutants from, its facility located at or near 7909 S. Union Ridge Parkway, Ridgefield, Washington 56010 (the "facility") where it operates a natural foods distribution center. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by UNFI.

I. COLUMBIA RIVERKEEPER'S COMMITMENT TO PROTECTING A FISHABLE AND SWIMMABLE COLUMBIA RIVER.

Columbia Riverkeeper's mission is to restore and protect the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Columbia Riverkeeper is a non-profit organization with members who live, recreate, and work throughout the Columbia River basin, including near and downstream of UNFI's facility.

Threats facing the Columbia River and its tributaries are severe by any measure. *See Columbia River Basin State of the River Report for Toxics,* Environmental Protection Agency, Region 10 (January 2009) (available online at: https://www.epa.gov/columbiariver/ 2009-state-river-report-toxics). In fact, the vast majority of rivers and streams in Washington fail to meet basic state water quality standards for pollutants such as toxics and temperature. *See* State of Washington 303(d) List (available online at: https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Assessment-of-state-waters-303d). Water quality standards are designed to protect designated uses, including aquatic life, fishing, swimming, and drinking water.

Stormwater runoff is "one of the great challenges of water pollution control" and "is a principal contributor to water quality impairment of waterbodies nationwide." *See Urban Storm Management in the United States,* National Research Council (Oct. 15, 2008) (available online at: http://www.epa.gov/npdes/pubs/nrc_stormwaterreport.pdf). When rain sends runoff across streets, construction projects, and industrial facilities, the water picks up contaminants that are drained into waterways such as the Columbia River and its tributaries. To address this leading cause of water quality impairment, Columbia Riverkeeper invests significant time and resources in reducing pollutant loads from industrial, municipal, and construction stormwater sources.

This Notice of Intent to Sue UNFI is part of Columbia Riverkeeper's effort to improve water quality in the Columbia River Basin for purposes including swimming, habitat quality, and subsistence, recreational, and commercial fishing. Columbia Riverkeeper has serious concerns about the impacts of UNFI's operations and industrial stormwater discharges on the Columbia River and its tributaries. As discussed below, UNFI has habitually failed to properly sample and report its stormwater discharges and failed to adopt and implement a SWPPP that satisfies the requirements of Washington's ISGP. UNFI's operations and stormwater discharges degrade water quality in the Columbia River Basin and may contribute to conditions that place the health of those who use the Columbia and its tributaries at risk.

II. COMPLIANCE WITH STANDARDS.

Condition S10.A of the Permit prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of

the Permit requires that UNFI's discharges not cause or contribute to an excursion of Washington State water quality standards.

UNFI discharges to a tributary which discharges to Gee Creek. UNFI discharges stormwater that contains elevated levels of turbidity, copper, and zinc as indicated in the table of benchmark excursions below. These discharges cause and/or contribute to violations of water quality standards for turbidity, copper, zinc, and aesthetic values in the tributary and Gee Creek and have occurred each and every day since Ecology issued UNFI ISGP coverage on which there was 0.1 inch or more of precipitation, and continue to occur. *See* WAC 173-201A-200 (Fresh water designated uses and criteria) (1)(a)(b)(general criteria that apply to all aquatic life fresh water uses), 1(e)(turbidity criteria), 2(a)(general criteria applicable to fresh water recreational uses), (4)(miscellaneous uses including wildlife habitat, harvesting commerce and navigation, boating, and aesthetics general criteria); WAC 173-201A-240 (Toxic substances criteria for copper and zinc); WAC 173-201A-260 (Natural conditions and other water quality criteria and applications); WAC 173-201A-600, 602(Use designations – Fresh waters; WAC 173-201A-602 – designated for Aquatic life use: Core summer salmonid habitat; Recreation use: Primary contact recreation; Water supply use: Domestic, Industrial, Agricultural, Stock, Wildlife Habitat; and Miscellaneous uses: Harvesting, Commerce and Navigation, Boating, Aesthetics). Precipitation data from that time period is appended to this notice of intent to sue.

Table 1: Benchmark Exceedances

Quarter for which sample was reported	Turbidity (Benchmark 25 NTU)	Zn Concentrations (Benchmark 117 µg/L)	Cu Concentration (Benchmark 14 µg/L)
3Q 2016	**45.2**	**1170**	**34.3**
4Q 2016	24.4	59	3.06
1Q 2017	14.1	52.7	6.26
2Q 2017	16.4	98.5	**19.4**
3Q 2017	**162**	**3240**	**111**
4Q 2017	11.6	**193**	4.53
1Q 2018	14.5	68	5.72
2Q 2018	"No Discharge"		
3Q 2018	"No Discharge"		
4Q 2018	**59.38**	**153.45**	10.08
1Q 2019	**38.7**	112	8.18
2Q 2019	8.62	71.2	6.44
3Q 2019	1.46	0.037	0.00105

Condition S10.C of the Permit requires UNFI to apply all known and reasonable methods of pollution prevention, control, and treatment ("AKART") to all discharges, including preparing and implementing an adequate SWPPP and best management practices ("BMPs"). UNFI has violated and continues to violate this condition by failing to apply AKART to its discharges by,

among other things, failing to implement an adequate SWPPP and BMPs. These violations have occurred on each and every day since Ecology issued UNFI ISGP coverage and continue to occur every day.

Condition S1.A of the Permit requires that all discharges and activities authorized be consistent with the terms and conditions of the permits. UNFI has violated these conditions by discharging and acting inconsistent with the conditions of the Permit as described in this notice of intent to sue.

III. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

UNFI has not developed and implemented a SWPPP that complies with the requirements of the Permit. The violations of the Permit's SWPPP provisions described below have occurred each and every day since Ecology issued UNFI ISGP coverage and will continue to occur each day for the foreseeable future.

A. Failure to Implement and Update a SWPPP

Condition S3.A.1 of the Permit requires UNFI to create and implement a SWPPP that is consistent with the Permit's requirements and to update the SWPPP as necessary to maintain compliance with permit conditions. UNFI is in violation of Condition S3.A because UNFI's SWPPP is not consistent with Permit requirements for a SWPPP, is not fully implemented, and has not been updated as necessary.

B. Failure to Prepare a SWPPP with AKART BMPs.

Condition S3.A.2 of the Permit requires the SWPPP to specify BMPs necessary to provide AKART. UNFI is violating Condition S3.A.2 because UNFI has failed to prepare a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

C. Failure to Timely Update the Facility's SWPPP.

Condition S3.A.4.c of the Permit requires the SWPPP to be updated and consistent with the 2015 ISGP by January 30, 2015. UNFI has violated Condition S3.A.4.c by failing to timely update and certify the facility's SWPPP, including as noted in Ecology's compliance inspection on April 25, 2018.

D. Failure to Describe Necessary BMPs.

UNFI's SWPPP fails to satisfy the requirements of Condition S3 of the Permit because it does not adequately describe the necessary BMPs. Condition S3.B.4 of the Permit requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.B.4 of the Permit requires that the SWPPP detail how and where the selected BMPs will be implemented. Condition S3.A.3 of the Permit requires that the SWPPP include BMPs consistent with approved

stormwater technical manuals (or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs). The current Stormwater Management Manual for Western Washington is available at https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Stormwater-permittee-guidance-resources/Stormwater-manuals. UNFI's SWPPP does not comply with these requirements because it does not adequately describe and explain in detail the BMPs selected, does not include BMPs consistent with approved stormwater technical manuals, or does not include BMPs that are demonstratively equivalent to approved BMPs with documentation of BMP adequacy.

E. Failure to Include a Site Map.

UNFI's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permit because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

F. Failure to Include a Facility Assessment.

UNFI's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permit because it fails to include a facility assessment. The SWPPP fails to include an adequate facility assessment because it does not adequately describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, the regular business hours, and the seasonal variations in business hours or industrial activities.

G. Failure to Include an Inventory of Industrial Activities.

UNFI's SWPPP fails to comply with Condition S3.B.2.b of the Permit because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants. The SWPPP does not identify all areas associated with outdoor storage of materials or products; outdoor manufacturing and processing; onsite dust or particulate generating processes; on-site waste treatment, storage, or disposal; vehicle and equipment fueling, maintenance, and/or cleaning; roofs or other surfaces exposed to air emissions from a manufacturing building or a process area; and roofs or other surfaces composed of materials that may be mobilized by stormwater, as required by these permit conditions.

H. Failure to Include an Inventory of Materials.

UNFI's SWPPP does not comply with Condition S3.B.2.c of the Permit because it

does not include an adequate inventory of materials. The SWPPP does not include: an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution; a short narrative for each material describing the potential for pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of pollutants; or a narrative description of any potential sources of pollutants from past activities, materials, and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater, as required. The SWPPP also does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants, as the Permit requires.

I. Failure to Identify Specific Individuals.

UNFI's SWPPP does not comply with Condition S3.B.3 of the Permit because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance, and modification.

J. Failure to Include and Implement Mandatory BMPs.

Condition S3.B.4 of the Permit requires that permittees include in their SWPPPs, and implement, certain mandatory BMPs unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP is provided. UNFI is in violation of these requirements because it has failed to include in its SWPPP, and implement, the mandatory BMPs required by the Permit, as detailed below.

K. Failure to Include Required Operational Source Control BMPs.

UNFI's SWPPP does not comply with Condition S3.B.4.b.i of the Permit because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage and treatment facilities, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs for preventing spills that can contaminate stormwater; for material handling procedures; storage requirements; cleanup equipment and procedures; and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how UNFI will comply with signature and record retention requirements, certification of compliance with the SWPPP and Permit, and all inspection reports completed by UNFI).

L. Failure to Include Measures to Identify and Eliminate Illicit Discharges.

UNFI's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permit because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges.

M. Failure to Include Structural Sources Control BMPs.

UNFI's SWPPP does not comply with Condition S3.B.4.b.ii of the Permit because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. UNFI's SWPPP does not comply with Condition S3.B.4.b.iii of the Permit because it does not include treatment BMPs as required.

N. Failure to Include BMPs to Prevent Soil Erosion.

UNFI's SWPPP fails to comply with Condition S3.B.4.b.v of the Permit because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

O. Failure to Include Records of Employee Training.

UNFI's SWPPP fails to comply with Condition S3.B.4.b.i.5 of the Permit because it does not include the required records of employee training, including as noted in Ecology's compliance inspection on April 25, 2018.

P. Failure to Include Required Details of Stormwater Sampling Plan.

UNFI's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permit because it fails to include all of the minimum required details of the stormwater sampling plan, including as noted in Ecology's compliance inspection on April 25, 2018. The SWPPP does *not* include a sampling plan that: identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations; documents why any discharge point is not sampled; identifies each sampling point by its unique identifying number; identifies staff responsible for conducting stormwater sampling; specifies procedures for sample collection and handling; specifies procedures for sending samples to the a laboratory; identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods; or specifies the procedure for submitting the results to Ecology.

IV. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permit requires UNFI to sample its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permit requires UNFI to

collect stormwater samples at each distinct point of discharge offsite for each pollutant described in condition S5.B, of the Permit. UNFI has violated these permit conditions each quarter it failed to sample each distinct point of discharge, and each quarter it failed to collect stormwater samples at any of its discharge points, including the second, third, and fourth quarters of 2016, and the second and third quarters of 2018.

Each failure to collect a sample of a required pollutant is a separate violation of the Clean Water Act.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 of the Permits requires UNFI to analyze quarterly stormwater samples for turbidity, pH, total copper, total zinc, and oil sheen. UNFI violated these conditions by failing to analyze stormwater samples for the second quarter of 2016 and for failing to analyze quarterly samples for pH and oil sheen in the third quarter of 2016, oil and grease during the fourth quarter of 2016.

C. Failure to Report Correct Discharge Monitoring Data.

Condition S9.A of the Permit requires UNFI to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. UNFI has violated these conditions by failing to submit a DMR for second quarter 2016, and by reporting copper and zinc discharge data incorrectly, including on UNFI's third quarter 2017 DMR, as noted by UNFI's consultant, and on UNFI's DMRs for fourth quarter 2016, first quarter 2017, first and fourth quarters 2018, and first, second, and third quarters 2019.

Condition S9.D of the Permit requires UNFI to include the results of any sampling it conducts more frequently than requires by the Permit. UNFI has violated this permit condition by failing to report the data making up the average discharge data reported on UNFI's fourth quarter of 2016 and second quarter of 2017 DMRs.

Where UNFI becomes aware that it submitted incorrect information in any report to Ecology, Condition G20 of the Permit requires UNFI to promptly submit such facts or information to Ecology. UNFI is in violation of Condition G20 including because it failed to promptly submit corrected DMRs and annual reports to Ecology after becoming aware that its reports were incorrect.

V. CORRECTIVE ACTION VIOLATIONS.

A. Failure to Implement Level One Corrective Actions.

Condition S8.B of the Permit requires UNFI take specified actions, called "Level One Corrective Action," each time quarterly stormwater sample results exceed any of the benchmark values described in Conditions S5.A and S5.B.

As described by Condition S8.B of the Permit, a Level One Corrective Action requires that UNFI: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permit and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with the Permit; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permit. Condition S8.B of the Permit requires that UNFI implement the revised SWPPP as soon as possible and no later than the DMR due date for the quarter the benchmark was exceeded. UNFI was reminded of this requirement by Ecology in the inspection report documenting the April 25, 2018 inspection.

Conditions S5.A and S5.B and Tables 2 and 3 of the Permit establish the following applicable benchmarks: turbidity 25 NTU; total copper 14 µg/L; and total zinc 117 µg/L.

UNFI violated the Level One Corrective Action requirements of the Permit described above by failing to conduct Level One Corrective Action in accordance with permit conditions, including the required investigation, the required review, revision, and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time quarterly stormwater sampling results were greater than a benchmark, including as identified in Table 1, above, and copper and zinc in the fourth quarter of 2016, copper and zinc in the first quarter of 2017, copper in the fourth quarter of 2017, copper and zinc in the first quarter of 2018, copper in the fourth quarter of 2018, and copper and zinc in the first and second quarters of 2019.

The benchmark exceedances identified above are based upon the information currently available to Riverkeeper from Ecology's publicly available records. UNFI's failure to report metals in the correct units also leads Riverkeeper to suspect that the facility has failed to conduct sufficient Level One Corrective Actions in response to additional benchmark exceedances including, but not limited to exceedances for: copper and zinc in the fourth quarter of 2016, copper and zinc in the first quarter of 2017, copper in the fourth quarter of 2017, copper and zinc in the first quarter of 2018, copper in the fourth quarter of 2018, and copper and zinc in the *first* and second quarters of 2019.

Riverkeeper provides notice of its intent to sue UNFI for failing to comply with all of the Level One Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value for any quarter during a calendar year, including any such excursions that are not discussed herein, since June 6, 2016.

B. Failure to Implement Level Two Corrective Actions.

Condition S8.C of the Permit requires UNFI take specified actions, called "Level Two Corrective Action," each time quarterly stormwater sample results exceed any of the benchmark values described in Conditions S5.A and S5.B for any two quarters in a calendar year.

As described by Condition S8.C of the Permit, a Level Two Corrective Action requires that UNFI: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with the Permit; and (3) summarize the Level Two Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permit. Condition S8.C of the Permit requires that UNFI implement the revised SWPPP as soon as possible, and no later than August 31 of the following year from the quarter the benchmark was exceeded. UNFI was reminded of Condition 8.C requirements by Ecology in the inspection report documenting the April 25, 2018 inspection.

The Permit establishes the benchmarks applicable to UNFI described in Section V.A of this notice of intent to sue letter.

UNFI violated the requirements of the Permit described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions—including the required review, revision, and certification of the SWPPP; the required implementation of additional BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the sampled point of discharge), including additional structural source control BMPs; and the required summarization in the annual report—each time since June 6, 2016 that UNFI's quarterly stormwater sampling results were greater than a benchmark for any two quarters during a calendar year. These violations include, but are not limited to, UNFI's failure to fulfill these obligations triggered by exceedances in the 2017 calendar year for copper and zinc.

The benchmark excursions identified above are based upon information currently available to Riverkeeper and from Ecology's publically available records. UNFI's failure to report metals in the correct units also leads Riverkeeper to suspect that the facility has failed to conduct sufficient Level Two Corrective Actions in response to additional benchmark exceedances in the last three years, including, but not limited to exceedances for copper and zinc during the 2016 calendar year. Riverkeeper provides notice of its intent to sue UNFI for failing to comply with all the Level Two Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value for any two quarters during a calendar year since June 6, 2016.

B. Failure to Implement Level Three Corrective Actions.

Condition S8.D of the Permit requires UNFI to take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year.

As described in Condition S8.D of the Permit, a Level Three Corrective Action requires UNFI: (1) review the SWPPP for the facility and insure that it fully complies with Condition S3 of the Permit; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and

additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permit; and (3) summarize the Level Three Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permit, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed. Condition S8.D.2 of the Permit requires that a Qualified Industrial Stormwater Professional review the revised SWPPP, sign its certification form, and certify that it is reasonably expected to meet benchmarks upon implementation.

Condition S8.D.3 of the Permit requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, that UNFI submit an engineering report (including the alternatives considered and why the option was selected; design data; results expected; a statement that the proposed treatment is reasonably expected to meet the benchmarks, supported by sound engineering justification; and certification by a licensed professional engineer), and an operations and maintenance manual to Ecology for review in. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The operations and maintenance manual must be submitted to Ecology no later than 30 days after construction/installation is complete.

Condition S8.D.5 of the Permit requires UNFI fully implement the revised SWPPP according to condition S3 of the Permit and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permit establishes the benchmarks applicable to UNFI described in Section V.A of this notice of intent to sue letter.

UNFI has violated Condition S8.D by failing to conduct the required elements of the Level Three Corrective Action UNFI triggered for copper and zinc during calendar year 2017.

VI. ANNUAL REPORT VIOLATIONS.

Condition S9.B of the Permit requires UNFI to submit complete and accurate annual reports to Ecology, no later than May 15 of each year using Ecology's Water Quality Permitting Portal.

As described by Condition S9.B of the Permit, annual reports shall include corrective action documentation and if corrective action is not complete, UNFI must describe the status of any outstanding corrective actions. Each annual report must: (1) identify the condition triggering the need for corrective action review; (2) describe the problem(s) and identify the dates they were discovered (for example, problems raised during the inspection by Ecology on April 25, 2018); (3) summarize any Level One, Two, and/or Three corrective actions completed during the previous calendar year and include the dates of completion; and (4) describe the status of any

Level Two or Three corrective actions triggered during the previous calendar year and identify the date of expected completion. UNFI must also retain a copy of all annual reports onsite.

UNFI violated the requirements of the Permits described above by failing to timely submit complete and accurate annual reports as required for 2016, 2017, and 2018.

VII. VIOLATIONS OF REPORTING AND RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the Permit requires UNFI record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if UNFI collected the sample within the first 12 hours of stormwater discharge event, an explanation of why UNFI could not collect a sample within the first 12 hours of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. UNFI is in violation of these conditions as it has not recorded each of these specified items for each sample taken since obtaining Permit coverage.

B. Failure to Retain Records.

Condition S4.4 and S9.C of the Permit requires UNFI to retain for a minimum of five years a copy of the current Permit, a copy of UNFI's coverage letter, records of all sampling information and laboratory documentation, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permit. UNFI is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation since obtaining Permit coverage.

VIII. FAILURE TO REPORT PERMIT VIOLATIONS.

Condition S9.E of the Permit requires UNFI to take certain actions in the event UNFI is unable to comply with any of the terms and conditions of the Permit which may endanger human health or the environment, or exceed any numeric effluent limitation in the permit. In such circumstances, UNFI must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and UNFI must immediately notify the appropriate Ecology regional office of the failure to comply. UNFI must then submit a detailed written report to Ecology, including specified details, within 5 days of the time UNFI became aware of the circumstances unless Ecology requests an earlier submission.

On information and belief, UNFI routinely violates these requirements, including each and every time UNFI failed to comply with the corrective action requirements described in section V of this notice of intent to sue, each and every time UNFI failed to sample a discharge point, and each and every time UNFI discharged stormwater with concentrations of pollutants in

excess of the Permit benchmarks and water quality criteria described above. All these violations may endanger human health or the environment.

IX. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the Permit, Columbia Riverkeeper hereby requests that UNFI provide Riverkeeper a copy of, or access to, UNFI's SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the address below.

Should UNFI fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, UNFI will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any resulting lawsuit.

X. PARTY GIVING NOTICE OF INTENT TO SUE.

The full name, address, and telephone number of the party giving notice is:

Columbia Riverkeeper
407 Portway Ave, Suite 301
Hood River, OR 97031
(541) 399-5312

XI. ATTORNEYS REPRESENTING RIVERKEEPER.

The attorneys representing Columbia Riverkeeper in this matter are:

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XII. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Columbia Riverkeeper based on its review of the public record. These violations are ongoing. Columbia Riverkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

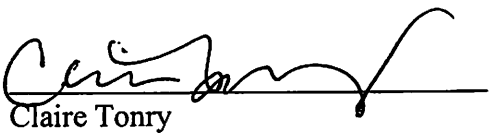
Under Section 309(d) of the CWA, 33 U.S.C § 1319(d), UNFI is subject to a separate daily penalty assessment for each violation (the current maximum daily penalty assessment is 37,500 per day for each violation that occurred through November 2, 2015 and $53,484 for each violation thereafter). In addition to civil penalties, Columbia Riverkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the Clean Water Act, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Columbia Riverkeeper believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. Columbia Riverkeeper intends, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against UNFI under Section 505(a) of the Clean Water Act for the violations described herein.

Columbia Riverkeeper is willing to discuss effective remedies for the violations described in this letter and settlement terms during the 60-day notice period. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within ten (10) days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends. If you believe that any of the allegations in this Notice are incorrect or based on incomplete information in the public record, please bring those facts to our attention.

Sincerely,

SMITH & LOWNEY, PLLC



Claire Tonry

cc: Andrew Wheeler, Acting Administrator, U.S. EPA
Chris Hladick, Acting Region 10 Administrator, U.S. EPA
Maia D. Bellon, Director, Washington Department of Ecology
Registered Agent (CT Corporation System, 711 Capitol Way S. Suite 204, Olympia, WA, 98501)
Lauren Goldberg, Legal and Program Director, Columbia Riverkeeper

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
		7/12/2016	0.01	8/23/2016	0
6/1/2016	0	7/13/2016	0	8/24/2016	0
6/2/2016	0.19	7/14/2016	0	8/25/2016	0
6/3/2016	0	7/15/2016	0	8/26/2016	0
6/4/2016	0	7/16/2016	0	8/27/2016	0
6/5/2016	0	7/17/2016	0	8/28/2016	0
6/6/2016	0	7/18/2016	0	8/29/2016	0
6/7/2016	0	7/19/2016	0	8/30/2016	0
6/8/2016	0	7/20/2016	0	8/31/2016	0
6/9/2016	0.08	7/21/2016	0	9/1/2016	0.06
6/10/2016	0.22	7/22/2016	0.3	9/2/2016	0.54
6/11/2016	0	7/23/2016	0	9/3/2016	0.01
6/12/2016	0	7/24/2016	0	9/4/2016	0
6/13/2016	0.01	7/25/2016	0	9/5/2016	0
6/14/2016	0.1	7/26/2016	0	9/6/2016	0.16
6/15/2016	0.05	7/27/2016	0	9/7/2016	0
6/16/2016	0.01	7/28/2016	0	9/8/2016	0
6/17/2016	0	7/29/2016	0	9/9/2016	0
6/18/2016	0.19	7/30/2016	0	9/10/2016	0
6/19/2016	0	7/31/2016	0	9/11/2016	0
6/20/2016	0	8/1/2016	0	9/12/2016	0
6/21/2016	0	8/2/2016	0	9/13/2016	0
6/22/2016	0	8/3/2016	0	9/14/2016	0
6/23/2016	0.53	8/4/2016	0	9/15/2016	0
6/24/2016	0.04	8/5/2016	0	9/16/2016	0
6/25/2016	0	8/6/2016	0	9/17/2016	0.88
6/26/2016	0	8/7/2016	0	9/18/2016	0
6/27/2016	0	8/8/2016	0.08	9/19/2016	0
6/28/2016	0	8/9/2016	0.01	9/20/2016	0
6/29/2016	0	8/10/2016	0	9/21/2016	0
6/30/2016	0	8/11/2016	0	9/22/2016	0
7/1/2016	0	8/12/2016	0	9/23/2016	0.04
7/2/2016	0	8/13/2016	0	9/24/2016	0
7/3/2016	0	8/14/2016	0	9/25/2016	0
7/4/2016	0	8/15/2016	0	9/26/2016	0
7/5/2016	0	8/16/2016	0	9/27/2016	0
7/6/2016	0	8/17/2016	0	9/28/2016	0
7/7/2016	0.07	8/18/2016	0	9/29/2016	0
7/8/2016	0.23	8/19/2016	0	9/30/2016	0
7/9/2016	0.03	8/20/2016	0	10/1/2016	0.12
7/10/2016	0.02	8/21/2016	0	10/2/2016	0.22
7/11/2016	0	8/22/2016	0	10/3/2016	0.01

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
10/4/2016	0.15	11/15/2016	0.1	12/27/2016	0.11
10/5/2016	0.25	11/16/2016	0.05	12/28/2016	0
10/6/2016	0.14	11/17/2016	0.02	12/29/2016	0.06
10/7/2016	0.25	11/18/2016	0	12/30/2016	0.01
10/8/2016	0.11	11/19/2016	0.11	12/31/2016	0.09
10/9/2016	0.85	11/20/2016	0.15	1/1/2017	0.05
10/10/2016	0	11/21/2016	0	1/2/2017	0
10/11/2016	0	11/22/2016	0.6	1/3/2017	0
10/12/2016	0.03	11/23/2016	0.27	1/4/2017	0
10/13/2016	1.99	11/24/2016	1.86	1/5/2017	0
10/14/2016	0.49	11/25/2016	0.33	1/6/2017	0
10/15/2016	0.51	11/26/2016	0.46	1/7/2017	0.02
10/16/2016	0.25	11/27/2016	0.23	1/8/2017	0.53
10/17/2016	0.44	11/28/2016	0.07	1/9/2017	0.28
10/18/2016	0.05	11/29/2016	0.1	1/10/2017	0.65
10/19/2016	0.23	11/30/2016	0.12	1/11/2017	0.07
10/20/2016	0.26	12/1/2016	0.02	1/12/2017	0
10/21/2016	0.48	12/2/2016	0.08	1/13/2017	0
10/22/2016	0.04	12/3/2016	0.14	1/14/2017	0
10/23/2016	0.07	12/4/2016	0.54	1/15/2017	0
10/24/2016	0.07	12/5/2016	0.25	1/16/2017	0
10/25/2016	0	12/6/2016	0	1/17/2017	0.7
10/26/2016	0.67	12/7/2016	0	1/18/2017	1.06
10/27/2016	0.16	12/8/2016	0.15	1/19/2017	0
10/28/2016	0.01	12/9/2016	0.7	1/20/2017	0.26
10/29/2016	0.16	12/10/2016	0.24	1/21/2017	0.33
10/30/2016	0.11	12/11/2016	0.41	1/22/2017	0.15
10/31/2016	0.19	12/12/2016	0.02	1/23/2017	0
11/1/2016	0	12/13/2016	0	1/24/2017	0
11/2/2016	0.05	12/14/2016	0.05	1/25/2017	0.01
11/3/2016	0	12/15/2016	0.01	1/26/2017	0
11/4/2016	0	12/16/2016	0	1/27/2017	0
11/5/2016	1.06	12/17/2016	0	1/28/2017	0
11/6/2016	0	12/18/2016	0	1/29/2017	0.01
11/7/2016	0	12/19/2016	0.84	1/30/2017	0
11/8/2016	0	12/20/2016	0.47	1/31/2017	0.01
11/9/2016	0.06	12/21/2016	0	2/1/2017	0
11/10/2016	0	12/22/2016	0.02	2/2/2017	0
11/11/2016	0	12/23/2016	0.19	2/3/2017	0.55
11/12/2016	0.07	12/24/2016	0	2/4/2017	0.59
11/13/2016	0.09	12/25/2016	0	2/5/2017	2.19
11/14/2016	1.03	12/26/2016	0.21	2/6/2017	0.04

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
2/7/2017	0.08	3/21/2017	0.23	5/2/2017	0.12
2/8/2017	1.01	3/22/2017	0.08	5/3/2017	0
2/9/2017	0.96	3/23/2017	0.32	5/4/2017	0.04
2/10/2017	0.09	3/24/2017	0.77	5/5/2017	0.15
2/11/2017	0	3/25/2017	0	5/6/2017	0
2/12/2017	0	3/26/2017	0.66	5/7/2017	0
2/13/2017	0	3/27/2017	0.01	5/8/2017	0
2/14/2017	0.01	3/28/2017	0.06	5/9/2017	0
2/15/2017	0.98	3/29/2017	0.19	5/10/2017	0
2/16/2017	1.7	3/30/2017	0	5/11/2017	0.16
2/17/2017	0	3/31/2017	0	5/12/2017	0.14
2/18/2017	0.25	4/1/2017	0.05	5/13/2017	0.57
2/19/2017	0.27	4/2/2017	0	5/14/2017	0.05
2/20/2017	0.81	4/3/2017	0	5/15/2017	0.22
2/21/2017	0.52	4/4/2017	0.01	5/16/2017	0.3
2/22/2017	0	4/5/2017	0	5/17/2017	0.16
2/23/2017	0	4/6/2017	0.59	5/18/2017	0
2/24/2017	0.07	4/7/2017	0.1	5/19/2017	0
2/25/2017	0.05	4/8/2017	0.04	5/20/2017	0
2/26/2017	0.14	4/9/2017	0.06	5/21/2017	0
2/27/2017	0.03	4/10/2017	0.18	5/22/2017	0
2/28/2017	0.02	4/11/2017	0.16	5/23/2017	0
3/1/2017	0	4/12/2017	0.48	5/24/2017	0
3/2/2017	0.06	4/13/2017	0.03	5/25/2017	0
3/3/2017	0.11	4/14/2017	0.09	5/26/2017	0
3/4/2017	0.14	4/15/2017	0	5/27/2017	0
3/5/2017	0.09	4/16/2017	0.02	5/28/2017	0
3/6/2017	0.11	4/17/2017	0.19	5/29/2017	0
3/7/2017	0.49	4/18/2017	0.05	5/30/2017	0
3/8/2017	0.43	4/19/2017	0.43	5/31/2017	0
3/9/2017	0.53	4/20/2017	0.09	6/1/2017	0.01
3/10/2017	0	4/21/2017	0	6/2/2017	0
3/11/2017	0.3	4/22/2017	0.14	6/3/2017	0
3/12/2017	0	4/23/2017	0.27	6/4/2017	0
3/13/2017	0.73	4/24/2017	1.02	6/5/2017	0
3/14/2017	0.62	4/25/2017	0.15	6/6/2017	0
3/15/2017	0.51	4/26/2017	0.21	6/7/2017	0
3/16/2017	0	4/27/2017	0.08	6/8/2017	0.29
3/17/2017	0.35	4/28/2017	0	6/9/2017	0.18
3/18/2017	0.36	4/29/2017	0.06	6/10/2017	0.06
3/19/2017	0	4/30/2017	0.01	6/11/2017	0
3/20/2017	0.11	5/1/2017	0.01	6/12/2017	0.03

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
6/13/2017	0.02	7/25/2017	0	9/5/2017	0
6/14/2017	0	7/26/2017	0	9/6/2017	0
6/15/2017	0.47	7/27/2017	0	9/7/2017	0
6/16/2017	0.02	7/28/2017	0	9/8/2017	0
6/17/2017	0	7/29/2017	0	9/9/2017	0.15
6/18/2017	0	7/30/2017	0	9/10/2017	0
6/19/2017	0	7/31/2017	0	9/11/2017	0
6/20/2017	0	8/1/2017	0	9/12/2017	0
6/21/2017	0	8/2/2017	0	9/13/2017	0
6/22/2017	0	8/3/2017	0	9/14/2017	0
6/23/2017	0	8/4/2017	0	9/15/2017	0
6/24/2017	0	8/5/2017	0	9/16/2017	0
6/25/2017	0	8/6/2017	0	9/17/2017	0.09
6/26/2017	0	8/7/2017	0	9/18/2017	0.49
6/27/2017	0	8/8/2017	0	9/19/2017	0.31
6/28/2017	0	8/9/2017	0	9/20/2017	1.09
6/29/2017	0	8/10/2017	0	9/21/2017	0.02
6/30/2017	0	8/11/2017	0	9/22/2017	0
7/1/2017	0	8/12/2017	0	9/23/2017	0
7/2/2017	0	8/13/2017	0.06	9/24/2017	0
7/3/2017	0	8/14/2017	0	9/25/2017	0
7/4/2017	0	8/15/2017	0	9/26/2017	0
7/5/2017	0	8/16/2017	0	9/27/2017	0
7/6/2017	0	8/17/2017	0	9/28/2017	0
7/7/2017	0	8/18/2017	0	9/29/2017	0.2
7/8/2017	0	8/19/2017	0	9/30/2017	0.03
7/9/2017	0	8/20/2017	0	10/1/2017	0.01
7/10/2017	0	8/21/2017	0	10/2/2017	0.02
7/11/2017	0	8/22/2017	0	10/3/2017	0
7/12/2017	0	8/23/2017	0	10/4/2017	0
7/13/2017	0	8/24/2017	0	10/5/2017	0
7/14/2017	0	8/25/2017	0	10/6/2017	0
7/15/2017	0	8/26/2017	0	10/7/2017	0.01
7/16/2017	0	8/27/2017	0	10/8/2017	0.02
7/17/2017	0	8/28/2017	0	10/9/2017	0
7/18/2017	0	8/29/2017	0	10/10/2017	0.01
7/19/2017	0	8/30/2017	0	10/11/2017	0.16
7/20/2017	0	8/31/2017	0	10/12/2017	0.5
7/21/2017	0	9/1/2017	0	10/13/2017	0
7/22/2017	0	9/2/2017	0	10/14/2017	0
7/23/2017	0	9/3/2017	0	10/15/2017	0
7/24/2017	0	9/4/2017	0	10/16/2017	0

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
10/17/2017	0.04	11/28/2017	0.44	1/9/2018	0.51
10/18/2017	0.09	11/29/2017	0	1/10/2018	0.04
10/19/2017	0.99	11/30/2017	0.07	1/11/2018	0.59
10/20/2017	0.11	12/1/2017	0.02	1/12/2018	0.07
10/21/2017	2.13	12/2/2017	0.28	1/13/2018	0
10/22/2017	0.47	12/3/2017	0.07	1/14/2018	0
10/23/2017	0	12/4/2017	0	1/15/2018	0.08
10/24/2017	0	12/5/2017	0	1/16/2018	0.04
10/25/2017	0	12/6/2017	0	1/17/2018	0.52
10/26/2017	0.01	12/7/2017	0	1/18/2018	0.17
10/27/2017	0	12/8/2017	0	1/19/2018	0.03
10/28/2017	0	12/9/2017	0	1/20/2018	0.01
10/29/2017	0	12/10/2017	0	1/21/2018	0.2
10/30/2017	0	12/11/2017	0	1/22/2018	0.11
10/31/2017	0	12/12/2017	0	1/23/2018	0.68
11/1/2017	0	12/13/2017	0	1/24/2018	0.62
11/2/2017	0.08	12/14/2017	0	1/25/2018	0.33
11/3/2017	0.01	12/15/2017	0	1/26/2018	0.21
11/4/2017	0.1	12/16/2017	0.02	1/27/2018	0.3
11/5/2017	0.15	12/17/2017	0.02	1/28/2018	0
11/6/2017	0	12/18/2017	0.02	1/29/2018	0.32
11/7/2017	0	12/19/2017	0.5	1/30/2018	0.01
11/8/2017	0.33	12/20/2017	0.03	1/31/2018	0
11/9/2017	0.27	12/21/2017	0	2/1/2018	0.1
11/10/2017	0.41	12/22/2017	0.42	2/2/2018	0
11/11/2017	0.13	12/23/2017	0.13	2/3/2018	0.02
11/12/2017	0.14	12/24/2017	0.25	2/4/2018	0
11/13/2017	0.36	12/25/2017	0.1	2/5/2018	0
11/14/2017	0	12/26/2017	0	2/6/2018	0
11/15/2017	0.86	12/27/2017	0.05	2/7/2018	0
11/16/2017	0.21	12/28/2017	0.66	2/8/2018	0
11/17/2017	0.11	12/29/2017	0.52	2/9/2018	0
11/18/2017	0	12/30/2017	0	2/10/2018	0
11/19/2017	0.17	12/31/2017	0	2/11/2018	0
11/20/2017	0.92	1/1/2018	0	2/12/2018	0
11/21/2017	0.61	1/2/2018	0	2/13/2018	0
11/22/2017	0.22	1/3/2018	0	2/14/2018	0.28
11/23/2017	0.18	1/4/2018	0.05	2/15/2018	0.08
11/24/2017	0	1/5/2018	0.22	2/16/2018	0.08
11/25/2017	0.12	1/6/2018	0.06	2/17/2018	0.08
11/26/2017	0.55	1/7/2018	0.12	2/18/2018	0.21
11/27/2017	0	1/8/2018	0.07	2/19/2018	0

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
2/20/2018	0.3	4/3/2018	0	5/15/2018	0
2/21/2018	0.02	4/4/2018	0.02	5/16/2018	0
2/22/2018	0.07	4/5/2018	0.38	5/17/2018	0
2/23/2018	0	4/6/2018	0.04	5/18/2018	0
2/24/2018	0.03	4/7/2018	1.14	5/19/2018	0
2/25/2018	0.18	4/8/2018	0.36	5/20/2018	0
2/26/2018	0	4/9/2018	0	5/21/2018	0
2/27/2018	0.02	4/10/2018	0.14	5/22/2018	0
2/28/2018	0.39	4/11/2018	0.15	5/23/2018	0
3/1/2018	0.04	4/12/2018	0.12	5/24/2018	0
3/2/2018	0	4/13/2018	0.02	5/25/2018	0
3/3/2018	0	4/14/2018	0.17	5/26/2018	0
3/4/2018	0	4/15/2018	0.34	5/27/2018	0
3/5/2018	0.03	4/16/2018	0.09	5/28/2018	0
3/6/2018	0	4/17/2018	0	5/29/2018	0
3/7/2018	0	4/18/2018	0	5/30/2018	0
3/8/2018	0.14	4/19/2018	0	5/31/2018	0.02
3/9/2018	0.01	4/20/2018	0	6/1/2018	0
3/10/2018	0	4/21/2018	0	6/2/2018	0
3/11/2018	0	4/22/2018	0	6/3/2018	0.03
3/12/2018	0	4/23/2018	0	6/4/2018	0
3/13/2018	0.38	4/24/2018	0	6/5/2018	0
3/14/2018	0.01	4/25/2018	0	6/6/2018	0
3/15/2018	0.22	4/26/2018	0	6/7/2018	0
3/16/2018	0.01	4/27/2018	0.03	6/8/2018	0.18
3/17/2018	0.22	4/28/2018	0.02	6/9/2018	0.2
3/18/2018	0	4/29/2018	0.03	6/10/2018	0.21
3/19/2018	0	4/30/2018	0.02	6/11/2018	0
3/20/2018	0	5/1/2018	0	6/12/2018	0
3/21/2018	0.21	5/2/2018	0	6/13/2018	0
3/22/2018	0.34	5/3/2018	0	6/14/2018	0
3/23/2018	0.56	5/4/2018	0	6/15/2018	0
3/24/2018	0.15	5/5/2018	0	6/16/2018	0.02
3/25/2018	0.1	5/6/2018	0.01	6/17/2018	0.37
3/26/2018	0.03	5/7/2018	0	6/18/2018	0
3/27/2018	0.05	5/8/2018	0.08	6/19/2018	0
3/28/2018	0	5/9/2018	0.01	6/20/2018	0
3/29/2018	0	5/10/2018	0.05	6/21/2018	0
3/30/2018	0	5/11/2018	0	6/22/2018	0
3/31/2018	0	5/12/2018	0	6/23/2018	0
4/1/2018	0.27	5/13/2018	0	6/24/2018	0
4/2/2018	0	5/14/2018	0	6/25/2018	0.02

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
6/26/2018	0	8/7/2018	0	9/18/2018	0
6/27/2018	0	8/8/2018	0	9/19/2018	0
6/28/2018	0	8/9/2018	0	9/20/2018	0
6/29/2018	0	8/10/2018	0	9/21/2018	0
6/30/2018	0	8/11/2018	0.01	9/22/2018	0.02
7/1/2018	0	8/12/2018	0	9/23/2018	0
7/2/2018	0.02	8/13/2018	0	9/24/2018	0
7/3/2018	0	8/14/2018	0	9/25/2018	0
7/4/2018	0	8/15/2018	0	9/26/2018	0
7/5/2018	0	8/16/2018	0	9/27/2018	0
7/6/2018	0	8/17/2018	0	9/28/2018	0
7/7/2018	0	8/18/2018	0	9/29/2018	0
7/8/2018	0	8/19/2018	0	9/30/2018	0.02
7/9/2018	0	8/20/2018	0	10/1/2018	0
7/10/2018	0	8/21/2018	0	10/2/2018	0.02
7/11/2018	0	8/22/2018	0	10/3/2018	0
7/12/2018	0	8/23/2018	0	10/4/2018	0
7/13/2018	0	8/24/2018	0	10/5/2018	0.47
7/14/2018	0	8/25/2018	0.01	10/6/2018	0.01
7/15/2018	0	8/26/2018	0	10/7/2018	0.1
7/16/2018	0	8/27/2018	0.04	10/8/2018	0.24
7/17/2018	0	8/28/2018	0	10/9/2018	0
7/18/2018	0	8/29/2018	0	10/10/2018	0
7/19/2018	0	8/30/2018	0	10/11/2018	0
7/20/2018	0	8/31/2018	0	10/12/2018	0
7/21/2018	0	9/1/2018	0	10/13/2018	0
7/22/2018	0	9/2/2018	0	10/14/2018	0
7/23/2018	0	9/3/2018	0	10/15/2018	0
7/24/2018	0	9/4/2018	0	10/16/2018	0
7/25/2018	0	9/5/2018	0	10/17/2018	0
7/26/2018	0	9/6/2018	0	10/18/2018	0
7/27/2018	0	9/7/2018	0	10/19/2018	0
7/28/2018	0	9/8/2018	0	10/20/2018	0
7/29/2018	0	9/9/2018	0	10/21/2018	0
7/30/2018	0	9/10/2018	0.06	10/22/2018	0
7/31/2018	0	9/11/2018	0.13	10/23/2018	0.02
8/1/2018	0	9/12/2018	0.82	10/24/2018	0
8/2/2018	0	9/13/2018	0.19	10/25/2018	0.34
8/3/2018	0	9/14/2018	0	10/26/2018	0.25
8/4/2018	0	9/15/2018	0	10/27/2018	1.36
8/5/2018	0	9/16/2018	0.35	10/28/2018	0.31
8/6/2018	0	9/17/2018	0	10/29/2018	0.09

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
10/30/2018	0.09	12/11/2018	0.59	1/22/2019	0.28
10/31/2018	0.13	12/12/2018	0.07	1/23/2019	0.02
11/1/2018	0.01	12/13/2018	0	1/24/2019	0
11/2/2018	0.09	12/14/2018	0	1/25/2019	0
11/3/2018	0.02	12/15/2018	0.05	1/26/2019	0
11/4/2018	0.17	12/16/2018	0.38	1/27/2019	0
11/5/2018	0.01	12/17/2018	0.45	1/28/2019	0
11/6/2018	0	12/18/2018	0.8	1/29/2019	0
11/7/2018	0	12/19/2018	0	1/30/2019	0
11/8/2018	0	12/20/2018	0.11	1/31/2019	0
11/9/2018	0	12/21/2018	0	2/1/2019	0.08
11/10/2018	0	12/22/2018	0.42	2/2/2019	0.01
11/11/2018	0	12/23/2018	0.45	2/3/2019	0.12
11/12/2018	0	12/24/2018	0.08	2/4/2019	0.04
11/13/2018	0	12/25/2018	0	2/5/2019	0.06
11/14/2018	0.03	12/26/2018	0.3	2/6/2019	0
11/15/2018	0	12/27/2018	0	2/7/2019	0
11/16/2018	0	12/28/2018	0.29	2/8/2019	0.16
11/17/2018	0	12/29/2018	0.43	2/9/2019	0.32
11/18/2018	0	12/30/2018	0.04	2/10/2019	0.14
11/19/2018	0	12/31/2018	0	2/11/2019	0.65
11/20/2018	0	1/1/2019	0	2/12/2019	0.77
11/21/2018	0.09	1/2/2019	0	2/13/2019	0.03
11/22/2018	0.59	1/3/2019	0.06	2/14/2019	0.31
11/23/2018	0.48	1/4/2019	0.03	2/15/2019	0.15
11/24/2018	0	1/5/2019	0.05	2/16/2019	0.12
11/25/2018	0	1/6/2019	0.25	2/17/2019	0
11/26/2018	0.15	1/7/2019	0	2/18/2019	0
11/27/2018	0.47	1/8/2019	0.2	2/19/2019	0.23
11/28/2018	0.33	1/9/2019	0.19	2/20/2019	0.06
11/29/2018	0	1/10/2019	0	2/21/2019	0
11/30/2018	0.42	1/11/2019	0	2/22/2019	0.25
12/1/2018	0.05	1/12/2019	0	2/23/2019	0.21
12/2/2018	0	1/13/2019	0	2/24/2019	0.37
12/3/2018	0	1/14/2019	0	2/25/2019	0.01
12/4/2018	0	1/15/2019	0	2/26/2019	0
12/5/2018	0	1/16/2019	0.15	2/27/2019	0
12/6/2018	0	1/17/2019	0.01	2/28/2019	0.01
12/7/2018	0	1/18/2019	1.11	3/1/2019	0.02
12/8/2018	0.02	1/19/2019	0.02	3/2/2019	0
12/9/2018	0.55	1/20/2019	0.42	3/3/2019	0
12/10/2018	0	1/21/2019	0	3/4/2019	0

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
3/5/2019	0	4/16/2019	0.03	5/28/2019	0
3/6/2019	0.16	4/17/2019	0	5/29/2019	0
3/7/2019	0.04	4/18/2019	0	5/30/2019	0
3/8/2019	0.07	4/19/2019	0.18	5/31/2019	0
3/9/2019	0	4/20/2019	0	6/1/2019	0
3/10/2019	0	4/21/2019	0	6/2/2019	0
3/11/2019	0.2	4/22/2019	0.01	6/3/2019	0
3/12/2019	0.37	4/23/2019	0	6/4/2019	0
3/13/2019	0	4/24/2019	0	6/5/2019	0
3/14/2019	0	4/25/2019	0	6/6/2019	0.01
3/15/2019	0	4/26/2019	0	6/7/2019	0.15
3/16/2019	0	4/27/2019	0.01	6/8/2019	0
3/17/2019	0	4/28/2019	0	6/9/2019	0
3/18/2019	0	4/29/2019	0	6/10/2019	0
3/19/2019	0	4/30/2019	0	6/11/2019	0
3/20/2019	0	5/1/2019	0	6/12/2019	0
3/21/2019	0	5/2/2019	0	6/13/2019	0
3/22/2019	0.04	5/3/2019	0	6/14/2019	0
3/23/2019	0.02	5/4/2019	0	6/15/2019	0
3/24/2019	0	5/5/2019	0	6/16/2019	0
3/25/2019	0.33	5/6/2019	0	6/17/2019	0
3/26/2019	0	5/7/2019	0	6/18/2019	0
3/27/2019	0.22	5/8/2019	0	6/19/2019	0
3/28/2019	0.07	5/9/2019	0	6/20/2019	0.07
3/29/2019	0	5/10/2019	0	6/21/2019	0
3/30/2019	0	5/11/2019	0	6/22/2019	0
3/31/2019	0	5/12/2019	0	6/23/2019	0
4/1/2019	0	5/13/2019	0	6/24/2019	0
4/2/2019	0.04	5/14/2019	0.11	6/25/2019	0.01
4/3/2019	0.03	5/15/2019	0.19	6/26/2019	0.1
4/4/2019	0.12	5/16/2019	0.03	6/27/2019	0.11
4/5/2019	0.31	5/17/2019	0	6/28/2019	0
4/6/2019	0.78	5/18/2019	0.19	6/29/2019	0
4/7/2019	0.47	5/19/2019	0.41	6/30/2019	0
4/8/2019	0.32	5/20/2019	0.05	7/1/2019	0.54
4/9/2019	0.11	5/21/2019	0	7/2/2019	0
4/10/2019	0.11	5/22/2019	0.11	7/3/2019	0
4/11/2019	0.19	5/23/2019	0	7/4/2019	0
4/12/2019	0	5/24/2019	0.05	7/5/2019	0
4/13/2019	0.12	5/25/2019	0.37	7/6/2019	0.05
4/14/2019	0.04	5/26/2019	0	7/7/2019	0
4/15/2019	0.11	5/27/2019	0	7/8/2019	0

DATE	PRECIPITATION (INCHES)	DATE	PRECIPITATION	DATE	PRECIPITATION
7/9/2019	0.12	8/20/2019	0	10/1/2019	0
7/10/2019	0.07	8/21/2019	0.2	10/2/2019	0
7/11/2019	0	8/22/2019	0	10/3/2019	0.02
7/12/2019	0	8/23/2019	0	10/4/2019	0.06
7/13/2019	0	8/24/2019	0	10/5/2019	0
7/14/2019	0	8/25/2019	0	10/6/2019	0
7/15/2019	0.01	8/26/2019	0	10/7/2019	0.08
7/16/2019	0	8/27/2019	0	10/8/2019	0.02
7/17/2019	0	8/28/2019	0	10/9/2019	0
7/18/2019	0.01	8/29/2019	0.06	10/10/2019	0
7/19/2019	0	8/30/2019	0.01	10/11/2019	0
7/20/2019	0	8/31/2019	0	10/12/2019	0
7/21/2019	0	9/1/2019	0	10/13/2019	0
7/22/2019	0	9/2/2019	0	10/14/2019	0
7/23/2019	0	9/3/2019	0		
7/24/2019	0	9/4/2019	0		
7/25/2019	0	9/5/2019	0		
7/26/2019	0	9/6/2019	0		
7/27/2019	0	9/7/2019	0.12		
7/28/2019	0	9/8/2019	0.18		
7/29/2019	0	9/9/2019	0.21		
7/30/2019	0	9/10/2019	0.28		
7/31/2019	0	9/11/2019	0		
8/1/2019	0	9/12/2019	0.01		
8/2/2019	0.04	9/13/2019	0.22		
8/3/2019	0	9/14/2019	0		
8/4/2019	0	9/15/2019	0.78		
8/5/2019	0	9/16/2019	0.01		
8/6/2019	0	9/17/2019	1.01		
8/7/2019	0	9/18/2019	0.3		
8/8/2019	0	9/19/2019	0.01		
8/9/2019	0.11	9/20/2019	0		
8/10/2019	0.8	9/21/2019	0		
8/11/2019	0	9/22/2019	0.09		
8/12/2019	0	9/23/2019	0		
8/13/2019	0	9/24/2019	0		
8/14/2019	0	9/25/2019	0		
8/15/2019	0	9/26/2019	0		
8/16/2019	0	9/27/2019	0.07		
8/17/2019	0.01	9/28/2019	0.21		
8/18/2019	0	9/29/2019	0.35		
8/19/2019	0	9/30/2019	0		